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Attorney for Defendant
JOSE JUAN CORONA

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. 2:24-cr-0066 DAD
)	
Plaintiff,)	STIPULATION REGARDING
)	EXCLUDABLE TIME PERIODS UNDER
v.)	SPEEDY TRIAL ACT; FINDINGS AND
)	ORDER
)	
JOSE JUAN CORONA,)	
)	
)	
Defendant.)	

STIPULATION

Plaintiff United States of America, by and through its counsel of record Assistant United States Attorneys ROSS PEARSON and CAILY NELSON and the Defendants, JOSE JUAN CORONA and ALFONSO GUADALUPE CORONA, by and through their counsel of record TASHA PARIS CHALFANT and CLEMENTE M. JIMENEZ, hereby stipulate and request that the Court make the following findings and Order as follows:

1. By previous order, this matter was set for a status conference on July 28, 2025, with time excluded to that date.

2. By this stipulation, the defendant now moves to reset the status conference to September 15, 2025, and to exclude time between July 28, 2025, and September 15, 2025, under

STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE

AND FOR EXCLUSION OF TIME

1 Local Code T4. Plaintiff does not oppose this request.

2 3. The parties agree and stipulate, and request that the Court find the following:

3 a. The government has represented that in addition to the PDF discovery associated
4 with this case, the newly discovery forensic extractions is voluminous. All of this discovery has
5 been either produced directly to counsel, and/or made available for inspection and copying.

6 b. Counsel for Defendant JOSE JUAN CORONA is not available on Monday, July
7 28, 2025, because she is scheduled to be in a multi-day evidentiary hearing in the District of Alaska
8 on that date. Further, counsel for the defendants anticipate plea agreements are forthcoming and
9 coordination needs to occur with Spanish interpreters to review such with their respective clients.
10 Finally, counsel needs the time to review the new discovery, consult the guidelines and conduct
11 investigation.

12 c. Counsel for the defendant believes that failure to grant the above-requested
13 continuance would deny them the reasonable time necessary for effective preparation, taking into
14 account the exercise of due diligence.

15 d. The government does not object to the continuance.

16 e. Based on the above-stated findings, the ends of justice served by continuing the
17 case as requested outweigh the interest of the public and the defendant in a trial within the original
18 date prescribed by the Speedy Trial Act.

19 f. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
20 et seq., within which trial must commence, the time period of July 28, 2025, to September 15,
21 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
22 T4] because it results from a continuance granted by the Court at defendant's request on the basis
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28 STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE

AND FOR EXCLUSION OF TIME

of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

5. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

All counsel has reviewed this proposed order and authorized Tasha Paris Chalfant to sign it on their behalf.

IT IS SO STIPULATED.

Dated: July 22, 2025 by: /s/Tasha Paris Chalfant for
ROSS PEARSON
CAILY NELSON
Assistant U.S. Attorneys
Attorneys for Plaintiff

Dated: July 22, 2025 by: /s/Tasha Paris Chalfant
TASHA PARIS CHALFANT
Attorney for Defendant
WENDY LABUDA

Dated: July 22, 2025 by: /s/Tasha Paris Chalfant for
CLEMENTE M. JIMENEZ
Attorney for Defendant
ALFONSO GUADALUPE CORONA

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AND FOR EXCLUSION OF TIME

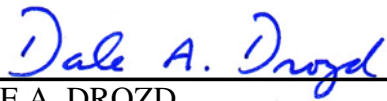
ORDER

The Court, having received, read, and considered the stipulation of the parties, and upon finding that a compelling showing of good cause for the requested continuance has been shown, adopts the stipulation of the parties in its entirety as its order. Based on the stipulation of the parties and the recitation of facts contained therein, the Court finds that the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds that the ends of justice to be served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial.

The Court orders that the time from the date of the parties' stipulation, July 28, 2025, to and including September 15, 2025, status conference hearing date shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C §3161(h)(7)(A) and (B) (iv), and Local Coonce again, de T4 (reasonable time for defense counsel to prepare). It is further ordered that the vacated status conference shall be reset on September 15, 2025, at 9:30 a.m. **However, once again, no further continuances of the of the status conference in this case will be granted absent a compelling showing of good cause.**

IT IS SO ORDERED.

Dated: July 22, 2025



DALE A. DROZD
UNITED STATES DISTRICT JUDGE

STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE
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